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December 12, 2000

DEPT OF TRANSPORTATION

Docket Management System  
U.S. Department of Transportation  
Room Plaza 401  
400 Seventh Street, S.W.  
Washington, DC 20590-0001

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RE: Docket No. FAA-2000-8274; Notice No. 00-13 - 13

To whom it may concern:

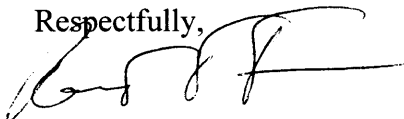
As a senior marketing executive of the largest aerial advertising company in the Country, I am mystified as to how the FAA could certify, as required by the Regulatory Flexibility Act of 1980, that the proposed Temporary Flight Restrictions (TFR) in the vicinity of major sporting events would not have a significant economic impact on a substantial number of small entities.

Providing coverage at major sporting events for local, regional, and national advertisers is the primary source of revenue for most aerial advertising companies in the United States. Should the Temporary Flight Restrictions be implemented as proposed, they will financially devastate our industry by denying aerial advertisers the ability to cover many of the venues they depend on for their livelihood. In our company's case, that livelihood translates ultimately into the aviation related careers of 66 men and women.

I am also deeply concerned about the future economic impact because of the highly subjective criteria to be used for establishing the TFR's. This increased regulatory power opens the door for abuse and could easily lead to TFR's being established at an ever expanding list of sporting and outdoor events.

I recognize the aim of the FAA in this rule making action is to protect both the flying and non-flying public at special events. There is and can be no argument with that aim. Safety is paramount. We have been covering major sporting events for over six decades without injury to the flying and non-flying public. My concerns are with the severe economic impact and the potential for regulatory abuse that the NPRM as published will have on our company and industry.

Respectfully,



Robert T. Foss  
Marketing Director



**AERIAL  
SIGN** COMPANY, INC.